



STATE OF UTAH  
DEPARTMENT OF HEALTH

NORMAN H. BANGERTER, GOVERNOR

SUZANNE DANDOO, M.D., M.P.H., EXECUTIVE DIRECTOR

June 3, 1985  
533-6146

RECEIVED

JUN 05 1985

DIVISION OF OIL  
CONSUMPTION

Mr. Dee Wilcox  
Bureau of Indian Affairs  
Cedar City Agency  
600 North 100 East  
Cedar City, Utah 84720

RE: Apex Project  
St. George Mining  
Leak Detection System

Dear Mr. Wilcox:

As the Water Pollution Control agency for the State of Utah we express appreciation for the opportunity extended to this Bureau to present our position and concerns about the leak detection system which is proposed for waste and product ponds of the Apex Project.

We have concurred on the use of the 200 Mil Gilsabind type liner for this project, however we have concerns about ponds being constructed without a leak detection system. The leak detection system will cause any leakage from the ponds to be detected so proper repairs can be made. Without a leak detection system it may not be possible to detect a leaking pond. This would allow the solution in the pond to seep through the soil until it entered the groundwater table where it would pollute and degrade the groundwater; this all could occur without being detected from the project site. However, once the pollution has entered the groundwater table it cannot be retrieved and could eventually impact present or future downflow users.

We feel it is in the best interest of all to protect our groundwater resource and request once again the support of the tribe in this effort. Because the liners are already under construction and the ponds are relatively small we request a meeting including the Bureau of Indian Affairs, St. George Mining and this Bureau be set for the week of June 3rd. Mr. Dietz of our staff will be in contact with you by phone to finalize this meeting.

KENNETH L. ALKEMA, DIRECTOR • DIVISION OF ENVIRONMENTAL HEALTH



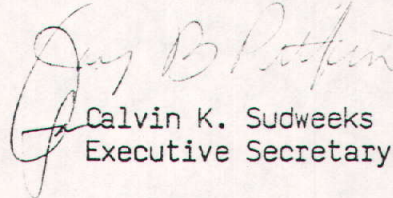
Mr. Dee Wilcox  
Page two

We have attached a copy of our letter to St. George Mining Corporation which further identifies our concerns.

Please call if there are any questions.

Sincerely,

UTAH WATER POLLUTION CONTROL COMMITTEE

  
Calvin K. Sudweeks  
Executive Secretary

tf

cc: Bob Renaud, St. George, Mining  
Rob Dorey, Steffen, Robertson, and Kirsten, Lakewood, CO  
Wayne Thomas, Southwestern District Health Department  
Steve Labrum, Southwestern District Health Department  
John Whitehead, Division of Oil, Gas and Mining

3345